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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**DEBTORS' RESPONSE TO THE
COURT'S ORDER RE TELEPHONIC
DISCOVERY CONFERENCE [DKT. NO.
3235]**

Date: August 7, 2019
Time: 9:30 a.m. PST
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Pursuant to the Court’s July 29, 2019 Order regarding a Telephonic Discovery Conference (Dkt. No. 3235), PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) submit this statement concerning open discovery issues with respect to the Official Committee of Tort Claimants (the “**TCC**”) and the Ad Hoc Group of Subrogation Claim Holders (the “**Subrogation Group**”) in advance of the conference scheduled for August 7, 2019.

I. The Debtors’ Requests to the TCC and Subrogation Group

As the Court is aware, on July 18, 2019, the Debtors filed their Motion for the Establishment of Wildfire Claims Estimation Procedures (Dkt. 3091) (the “**Estimation Procedures Motion**”). In connection with the Estimation Procedures Motion and anticipated estimation proceedings, the Debtors have sought discovery from both the TCC and the Subrogation Group concerning the alleged values of the claims that they have asserted and will assert against the Debtors. To date, although the TCC alleges that total damages for wildfire claims exceed \$50 billion and the Subrogation Group claims damages approaching or exceeding \$20 billion, neither has provided any documentation or other information to the Debtors—or any other stakeholders—to substantiate those claims.

The Debtors have the following currently outstanding requests to the TCC concerning their wildfire damages claims:

- Any and all documents and/or information in the possession, custody or control of the TCC, its financial advisors, and the trial lawyers (including but not limited to Frank Pitre and Michael Kelly) that support the TCC’s assertion, calculation and/or justification of alleged damages, including the \$54 billion amount asserted in the TCC’s recent filings.
- Any and all documents and/or information in the possession, custody or control of those same individuals or entities concerning the damages asserted by any wildfire claimant.

- Any and all documents and/or information in the possession, custody or control of those same individuals or entities concerning Butte fire settlements.
- All documents and/or information concerning the claims of the members of the TCC who assert wildfire claims.

The TCC has not yet provided the Debtors with its position on these discovery issues, which the Debtors raised by letter dated August 1, 2019. In that letter, the Debtors also stated their willingness to discuss using a damages questionnaire that each claimant would be required to timely complete to provide basic information essential to the calculation of economic and non-economic damages, including supporting documentation.

Additionally, the Debtors have the following outstanding requests to the Subrogation Group:

- All Documents, Communications and ESI concerning or relating to the underlying insured losses that relate to the Subrogation Wildfires Claims Amount, including, but not limited to, the underlying claims files.
- All Documents, Communications and ESI concerning or relating to the calculations, studies, projections, estimates and/or analyses concerning and/or relating to the Subrogation Wildfires Claims Amount.

Finally, on July 23, 2019, the Debtors served a subpoena on the Custodian of Records of BrownGreer PLC to request the production of “[a]ll documents and ESI contained in and/or accessible through the BrownGreer Portal.”¹ At BrownGreer’s request, the Debtors have agreed to extend the response date on that subpoena until August 9, 2019. Based on discussions with counsel for the wildfire claimants, including the leadership group from the

¹ The “BrownGreer Portal” refers to the online repository that was used previously in the state court proceedings (JCCP No. 4955 California North Bay Fire Cases), and now as part of these Chapter 11 Cases, to store plaintiff-specific damages and claims-related information, uploaded by law firms representing individual claimants related to their wildfire-related claims.

1 state court proceedings, the Debtors believe they have an agreement in principle with the
2 wildfire claimants to adopt many of the claimant-specific systems, procedures and individual
3 protections ordered in the state court in relation to the BrownGreer Portal. The Debtors and
4 the wildfire claimants are working on the details of an agreement that, if finalized, will provide
5 the Debtors and certain other stakeholders with access to the BrownGreer Portal and provide a
6 process to continue discussions about a potential consensual resolution of the individual
7 wildfire claims.

8 **II. Responses to TCC Submission (Dkt. No. 3351) and Subrogation Group Submission**
9 **(Dkt. No. 3352)**

10 The Debtors' responses to each of the TCC's requests, as detailed in its
11 submission (Dkt. 3351), are below.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
Outstanding Claims Estimation Documents			
1	Settlement demands and settlement agreements from the 2015 Butte Fire and the 2010 San Bruno Explosion (Accepted foundation of estimating claims in mass tort bankruptcies ("Claims Estimation"). In re Eagle-Picher Indus., Inc., 189 B.R. 681, 684 (Bankr. S.D. Ohio 1995), as amended (Dec. 14, 1995).)	6/27/2019	The TCC and the Debtors have met and conferred about settlement documents, which are subject to various state and Federal privileges and immunities from production. The Debtors are prepared to produce documents concerning the 2015 Butte Fire if these privilege issues, including the state law mediation privilege, can be addressed.
2	All documents setting forth any allocation of settlement amounts to various categories of damages from the 2015 Butte Fire settlements. (Claims Estimation)	6/27/2019	<u>See</u> Response to Request 1.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
3	All documents used by the Debtors to estimate their potential losses on the 2010 San Bruno Explosion, the 2015 Butte Fire, the Ghost Ship fire, and the 2017 and 2018 Northern California Wildfires, including in their January 2019 8-K, February 2019 8-K and May 2019 10-Q. (Debtors' admission of potential tort claims exposure ("Debtors' Claims Estimation"))	6/27/2019	The Debtors have produced, or confirmed they will produce, all non-privileged documents concerning any estimates of their potential losses related to the 2015 Butte Fire, the Ghost Ship fire, and the 2017 and 2018 Northern California Wildfires, including in their January 2019 8-K, February 2019 8-K and May 2019 10-Q. The Debtors do not believe discovery into the 2010 San Bruno Explosion, for which there are no claims in these cases, is necessary or appropriate.
4	All documents used by Jason Wells to support the statement in his January 2019 Declaration that PGE's potential liability for the 2017 and 2018 wildfires could exceed \$30B. (Debtors' Claims Estimation)	6/27/2019	The Debtors have produced all responsive, non-privileged documents located after a reasonable search.
5	All documents setting forth the fines and penalties the Debtors incurred in connection with the 2015 Butte Fire and the 2017 and 2018 Northern California Wildfires. (Debtors' Claims Estimation)	6/27/2019	The Debtors will produce any outstanding documents by August 9, 2019.
6	All documents explaining the figures set forth in Debtors' January 2019 8-K, February 2019 8-K and May 2019 10-Q filings disclosing PG&E settled 2015 Butte Fire claims to date for \$900M. (Debtors' Claims Estimation)	6/27/2019	<u>See</u> Response to Request 1.
7	All documents explaining the figures set forth in Debtors' January 2019 8-K, February 2019 8-K and May 2019 10-Q filings disclosing that the 2015 Butte Fire claims involved 549 residences, 2,000 households and 3,900 plaintiffs. (Debtors' Claims Estimation)	6/27/2019	<u>See</u> Response to Request 1.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
8	All documents produced to the SEC or documents detailing any meetings or proceedings with the SEC in connection with the SEC's investigation into "public disclosures and accounting for losses associated with the 2017 and 2018 Northern California wildfires and the 2015 Butte fire" disclosed in PGE's first quarter 2019 report. (Debtors' Claims Estimation)	6/27/2019	The Debtors have produced, and will produce, documents responsive to other properly served Requests that are also responsive to this Request. However, the Debtors do not believe they have an obligation to produce documents merely because they were produced to the SEC. The Debtors have requested the TCC explain why this Request is appropriate. The TCC is yet to respond.
Outstanding Documents Covered by the May 28, 2019 Order [Dkt. No. 2255]			
9	All formal reports prepared by or at the request of any special litigation committee or committee of the Board of the Debtors, or any investigation or audit team including without limitation all formal audit committee reports on the Relevant Subjects and the wildfires that occurred during the 2017 and 2018 wildfire seasons. [Dkt. No. 2255 ¶ 5.]	3/8/2019	The Debtors have not located any responsive, non-privileged documents after a reasonable search.
10	All formal investigation reports prepared by the Debtors' counsel, auditors or investigators on the Relevant Subjects and the wildfires that occurred during the 2017 and 2018 wildfire seasons. [Dkt. No. 2255 ¶ 6]	3/8/2019	The Debtors have not located any responsive, non-privileged documents after a reasonable search.
11	All ratifications of the Company's officers' and directors' actions granted during the applicable period. [Dkt. No. 2255 ¶ 7]	3/8/2019	The Debtors have not located any responsive, non-privileged documents after a reasonable search.
12	Agreements between PG&E and third party contractors who worked on the Caribou-Palermo Line. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	The Debtors have produced all responsive documents located after a reasonable search.
13	Agreements between PG&E and third party contractors who inspected the C-Hook on Tower 27/222. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	The Debtors have not identified any Third Party Contractors who performed electrical inspections on Tower 27/222 between January 1, 2009 and November 8, 2018, the agreed upon time period for this request. There are, therefore, no documents to produce.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
14	Documents describing the scope of the third party contractors' services related to the Caribou-Palermo Line. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	In response to this request, the Debtors produced contracts between Third Party Contractors and PG&E describing the scope of the Third Party Contractors' services related to the Caribou-Palermo Line. The Debtors have not located any other responsive documents after a reasonable search.
15	Documents describing the work performed by third party contractors on the Caribou-Palermo Line. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	In response to this request, the Debtors produced contracts between Third Party Contractors and PG&E describing the work performed by the Third Party Contractors related to the Caribou-Palermo Line. The Debtors have not located any other responsive documents after a reasonable search.
16	Documents containing the findings or work product of all third party contractors performing work on the Caribou-Palermo Line, including Risk Assessments. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	In response to this request, the Debtors produced vegetation management records from Third Party Contractors who performed vegetation management from 2012 to November 8, 2018. The Debtors' position is that producing vegetation management records from prior to 2012 is unduly burdensome and such documents are not relevant to the TCC's claims. The Debtors have not located any other responsive documents after a reasonable search.
17	All insurance policies that provide coverage for claims arising from the work of third party contractors who performed work on the Caribou-Palermo Line. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	There are no such insurance policies in the Debtors' possession located after a reasonable search.
18	Inspection reports relating to work performed on Tower 27/222 by third party contractors. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	The Debtors have produced all responsive documents located after a reasonable search, to the extent any such documents exist.
19	Each writing which documents any inspection performed of Tower 27/222 on the Caribou-Palermo Line. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	The Debtors have produced all responsive documents located after a reasonable search, to the extent any such documents exist.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
20	Each writing which sets forth the result of any inspection performed on Tower 22/227 at any time from January 1, 2009 to and including April 24, 2019 by any third-party contractor performing work on the Caribou-Palermo Line. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	The Debtors have produced all responsive documents located after a reasonable search, to the extent any such documents exist.
21	Insurance policies or other proof of coverage provided by any third-party contractor that performed any Vegetation Management or Electrical Services for each of the Northern California Wildfires. [Dkt. Nos. 2255 ¶ 1 and 3205]	4/29/2019	The Debtors have produced all responsive documents located after a reasonable search.
22	All audit committee directives to directors and officers directing them to take action or correct matters relating to dividends, wildfire claims, wildfire safety. [Dkt. No. 2504]	3/8/2019	The TCC incorrectly cites to Docket No. 2504; this request corresponds to Request 18 of Exhibit C to the TCC's April 30, 2019 letter to the Court. The Debtors have not located any responsive, non-privileged documents after a reasonable search.
23	All notifications to insurers for claims threatened or asserted against Directors & Officers and the Debtors for the 2014-2019 policy periods, including notices and tenders of claims. [Dkt. No. 2504]	3/8/2019	The TCC incorrectly cites to Docket No. 2504; this request corresponds to Request 16 of Exhibit C to the TCC's April 30, 2019 letter to the Court. The TCC also misstates the scope of the request. Request 16 of Exhibit C seeks "all notifications to insurers of claims threatened or asserted against the Company or its directors and officers during the applicable period [Jan 29, 2016 – May 28, 2019] . . . that relate to dividends, wildfire claims, wildfire safety, and insider transactions." The Debtors have produced all documents located after a reasonable search.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
24	All reports that address misuse of funds or Company property by Company directors and officers. [Dkt. No. 2504]	3/8/2019	<p>The TCC incorrectly cites to Docket No. 2504; this request corresponds to Request 13 of Exhibit C to the TCC's April 30, 2019 letter to the Court.</p> <p>The Debtors have not located any responsive, non-privileged documents after a reasonable search.</p>
25	Any non-public report that summarizes trades of the Company's stock during the applicable period by the Company's directors or officers. [Dkt. No. 2504]	3/8/2019	<p>The TCC incorrectly cites to Docket No. 2504; this request corresponds to Request 23 of Exhibit C to the TCC's April 30, 2019 letter to the Court.</p> <p>The Debtors have not located any responsive, non-privileged documents after a reasonable search.</p>
Outstanding Documents Covered by the June 12, 2019 Order [Dkt. No. 2504]			
26	All Punitive Damage Liability Policies for 2015 [Dkt. No. 2504]	6/7/2019	The Debtors will produce any outstanding documents by August 9, 2019.
27	All Errors & Omissions Policies for 2015-2019 [Dkt. No. 2504]	6/7/2019	To the extent these documents are responsive to the TCC's request for "copies of insurance policies . . . that have provided or may provide coverage for any claim against the Debtors arising from or concerning the Northern California Wildfires" or "the Ghost Ship Fire", the Debtors provided the TCC with such policies on June 27, 2019.
28	All Property Insurance Policies for 2015-2019 [Dkt. No. 2504]	6/7/2019	The Debtors do not believe these documents are responsive to the TCC's request for "copies of insurance policies . . . that have provided or may provide coverage for any claim against the Debtors arising from or concerning the Northern California Wildfires" or "the Ghost Ship Fire".

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
29	All Environmental Insurance Policies for 2015-2019 [Dkt. No. 2504]	6/7/2019	To the extent these documents are responsive to the TCC's request for "copies of insurance policies . . . that have provided or may provide coverage for any claim against the Debtors arising from or concerning the Northern California Wildfires" or "the Ghost Ship Fire", the Debtors provided the TCC with such policies on June 27, 2019.
30	All Products Liability Policies for 2015-2019 [Dkt. No. 2504]	6/7/2019	To the extent these documents are responsive to the TCC's request for "copies of insurance policies . . . that have provided or may provide coverage for any claim against the Debtors arising from or concerning the Northern California Wildfires" or "the Ghost Ship Fire", the Debtors provided the TCC with such policies on June 27, 2019.
31	All Fiduciary Liability Policies for 2015-2019 [Dkt. No. 2504]	6/7/2019	The Debtors do not believe these documents are responsive to the TCC's request for "copies of insurance policies . . . that have provided or may provide coverage for any claim against the Debtors arising from or concerning the Northern California Wildfires" or "the Ghost Ship Fire".
32 ²	PG&E 2015-16 General Liability Policy: Ace Bermuda Ins. Ltd., Policy No. PCG-1035/5 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
33	PG&E 2015-16 General Liability Policy: AIG Excess Limited, Policy No. 26157606 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
34	PG&E 2015-16 General Liability Policy: AIG Excess Limited (formerly Starr Excess), Policy No. 200682 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.

² With respect to requests 32-68, the TCC did not inform the Debtors of any specific deficiencies in the Debtors' production until prior to its August 1, 2019, filing with the Court. The Debtors require further clarification from the TCC as to why they believe the insurance policies produced in response to these requests are incomplete and are prepared to meet and confer with the TCC on this issue.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
35	PG&E 2015-16 General Liability Policy: Apollo Consortium, Policy No. 15NL5257490 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
36	PG&E 2015-16 General Liability Policy: Argo Re, Policy No. ARGO-CAS-OR-000398 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
37	PG&E 2015-16 General Liability Policy: Argo Re Limited, Policy No. ARGO-CAS-OR-000594 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
38	PG&E 2015-16 General Liability Policy: Argo Re Limited, Policy No. ARGO-CAS-OR-000106 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
39	PG&E 2015-16 General Liability Policy: Argo Re Limited, Policy No. ARGO-CAS-OR-000690 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
40	PG&E 2015-16 General Liability Policy: AW AC, Policy No. C015037 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
41	PG&E 2015-16 General Liability Policy: Canopus Bermuda, Policy No. PGE-005/004 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
42	PG&E 2015-16 General Liability Policy: Iron Starr, Policy No. 1S0000624 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
43	PG&E 2015-16 General Liability Policy: Iron Starr, Policy No. 0000050-00 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
44	PG&E 2015-16 General Liability Policy: Iron Starr, Policy No. IS0001954 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
45	PG&E 2015-16 General Liability Policy: Markel Bermuda Ltd. (MaxBermuda), Policy No. 29692-3176-UMB-2009 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
46	PG&E 2015-16 General Liability Policy: OCIL, Policy No. U920021-0804 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
47	PG&E 2016-2017 General Liability Policy: Canopus, Policy No. PGE-005/00 [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
48	PG&E 2016-17 General Liability Policy: Argo Re, Policy No. ARGO-CAS-OR-000398 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
49	PG&E 2016-17 General Liability Policy: Argo Re, Policy No. ARGO-CAS-OR-000594 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
50	PG&E 2016-17 General Liability Policy: Liberty, Policy No. DL473806 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
51	PG&E 2016-17 General Liability Policy: Apollo Consortium, Policy No. DL638514 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
52	PG&E 2016-17 General Liability Policy: Munich Re, Policy No. EI291315 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
53	PG&E 2016-17 General Liability Policy: AXIS US, Policy No. EAU742127/01/2015 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
54	PG&E 2016-17 General Liability Policy: Argo Re, Policy No. ARGO-CAS-OR-000106 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
55	PG&E 2016-17 General Liability Policy: Argo Re, Policy No. ARGO-CAS-OR-000690 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
56	PG&E 2016-17 General Liability Policy: Iron Starr Excess Agency Ltd., Policy No. IS0002821 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
57	PG&E 2016-17 Punitive Liability Policy: Mana Carta Insurance, Ltd, Policy No. MCPD203305 [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
58	PG&E 2016-17 Punitive Liability Policy: Mana Carta Insurance, Ltd, Policy No. MCPD203306 [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
59	PG&E 2016-17 Punitive Liability Policy: Mana Carta Insurance, Ltd, Policy No. MCPD203309 [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
60	PG&E 2017-2018 General Liability Policy: American International Reinsurance, Policy No. 200682 [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
61	PG&E 2017-2018 General Liability Policy: Allied World Assurance Company Ltd, Policy No. C015037 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
62	PG&E 2017-2018 General Liability Policy: Argo Re, Policy No. ARGO-CAS-OR-000398 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
63	PG&E 2017-2018 General Liability Policy: Apollo (Lloyds), Policy No. B0509BOWCN1500003 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
64	PG&E 2017-2018 General Liability Policy: Iron Starr Excess Agency Ltd., Policy No. IS0002821 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
65	PG&E 2017-2018 General Liability Policy: OCIL, Policy No. U920021-0804 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
66	PG&E 2018-2019 General Liability Policy: Apollo (Lloyds), Policy No. PL 1800075 [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
67	PG&E 2018-2019 General Liability Policy: Inter Hannover (Lloyds), Policy No. BOWCN1500033 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
68	PG&E 2018-2019 General Liability Policy: Allianz Global Corporate & Specialty SE, Policy No. PL1800076 (full policy not produced) [Dkt. No. 2504]	6/7/2019	The Debtors produced this policy on June 27, 2019. The Debtors need further information about what is missing.
Other Outstanding Documents			
69	All PG&E Director & Officer Liability Policies for 2014-15. (The TCC desires assignment of Debtors' litigation assets to tort resolution trust under plan, i.e., the pot. Documents necessary to value litigation asset ("Assigned Asset").)	3/5/2019	The Debtors do not believe that policies from 2014 are relevant to these Chapter 11 Cases.

No.	Outstanding Documents per TCC Submission	Date Requested	Debtors' Response
70	All PG&E Director & Officer Liability Policies for 2016-17 (Assigned Asset)	3/5/2019	The Debtors will produce any outstanding documents by August 9, 2019.

The Debtors' responses to each of the Subrogation Group's requests included in their filing (Dkt. No. 3352) are below.

	Outstanding Documents Per Subrogation Group Response	Date Requested	Debtors' Response
1	Non-destructive examination of PG&E equipment and other evidence collected in connection with the 2017 and 2018 wildfires, including near any potential area(s) of origin.	7/1/2019	The Debtors have explained to the Subrogation Group that they agree with this request and that similar testing should be conducted of evidence in the possession of the subrogation group and/or any third parties.
2	Non-destructive examination of evidence in CAL FIRE's possession and depositions of appropriate CAL FIRE investigators and representatives.	7/1/2019	The Debtors have explained to the Subrogation Group that they agree with this request.
3	Documents relating to PG&E's policies and practices regarding de-energizing power in certain weather conditions and vegetation management.	7/1/2019	The Debtors have explained to the Subrogation Group that they are willing to agree to reasonable discovery in the context of estimation proceedings on these topics.
4	Depositions of PG&E representatives who were not deposed on relevant issues pre-petition.	7/1/2019	The Debtors have explained to the Subrogation Group that they are willing to agree to reasonable discovery in the context of estimation proceedings on relevant issues.
5	Documents sent by PG&E to the CPUC regarding the Caribou-Palermo 115kV transmission line (Camp Fire).	7/1/2019	The Debtors have explained to the Subrogation Group that they are willing to agree to reasonable discovery in the context of estimation proceedings on relevant issues.
6	Documents regarding the Caribou-Palermo 115kV transmission line 10 miles on either side of transmission tower 27/222 (Camp Fire).	7/1/2019	The Debtors have explained to the Subrogation Group that they are willing to agree to reasonable discovery in the context of estimation proceedings on relevant issues.

	Outstanding Documents Per Subrogation Group Response	Date Requested	Debtors' Response
7	Documents concerning the tap line on Zink Hill, including vegetation management in or around the same (Tubbs Fire).	7/1/2019	The Debtors have explained to the Subrogation Group that they are willing to agree to reasonable discovery in the context of estimation proceedings on relevant issues.
8	Documents or information that support estimates or projections of wildfire claim amounts as set forth in public and court filings by the Debtors.	7/1/2019	The Debtors have produced all non-privileged documents on this topic in response to the TCC's requests.

Dated: August 5, 2019

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/s/ Kevin J. Orsini

Kevin J. Orsini

Attorneys for Debtors and Debtors in Possession